

Exhibit A

October 2001 Fee Application

UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF DELAWARE

In re:)	
)	Chapter 11
)	
W.R. GRACE & CO., <i>et al</i>)	Case No. 01-01139 (JJF)
)	(Jointly Administered)
)	
Debtors.)	

**SUMMARY COVERSHEET TO SEVENTH MONTHLY INTERIM APPLICATION OF
WALLACE KING MARRARO & BRANSON PLLC
FOR COMPENSATION AND FOR REIMBURSEMENT OF EXPENSES FOR
OCTOBER 1, 2001 THROUGH OCTOBER 31, 2001**

Name of Applicant:	Wallace King Marraro & Branson PLLC. ("WKMB")
Authorized to provide professional services to:	Special Litigation and Environmental Counsel to Debtors
Date of Retention:	April 2, 2001
Period for which compensation and reimbursement is sought:	October 1, 2001 through October 31, 2001.
Amount of compensation sought as actual, reasonable and necessary	\$76,674.32 for the period October 1, 2001 through October 31, 2001 (80% of \$95,842.90, in professional fees).
Amount of expense reimbursement sought as actual, reasonable, and necessary:	\$10,019.94 for the period October 1, 2001 through October 31, 2001.

This is a: Monthly interim application.

Prior Applications filed: Yes.

Date Filed	Period Covered	Requested Fees	Requested Expenses	Status of Fees	Status of Expenses
7/5/01	4/2/01 through 4/30/01	\$216,471.50	\$25,282.16	80% Paid	100% Paid
7/5/01	5/1/01 through 5/31/01	\$244,726.00	\$26,594.89	80% Paid	100% Paid
8/9/01	6/1/01 through 6/20/01	\$186,977.91	\$90,104.66	80% Paid	100% Paid
8/28/01	7/1/01 through 7/31/01	\$101,544.08	\$52,387.36	80% Paid	100% Paid
10/18/01	8/1/01 through 8/31/01	\$85,722.80	\$56,387.04	No objections served on Counsel	No objections served on Counsel
11/05/01	9/1/01 through 9/30/01	\$66,562.16	\$24,668.50	No objections served on Counsel	No objections served on counsel

As indicated above, this is the seventh application for interim compensation of services filed with the Bankruptcy Court in the Chapter 11 Cases

Summary of Compensation Requested

Name of Professional Individual	Position, year assumed, prior relevant experience, year of obtaining relevant license to practice	Hourly Billing Rate (including Changes)	Total Hours Billed	Total Compensation
Christopher Marraro	Partner	\$420	80.9	\$33,978.00
Angela Pelletier	Associate	\$200	91.1	\$18,220.00
William Hughes	Counsel	\$305	174.6	\$53,253.00

Tamara Parker	Associate	\$260	26.5	\$6,890.00
Peter Condron	Counsel	\$335	2.5	\$837.50
Letta Sneed	Associate	215	2.1	\$451.50
Barbara Banks	Paralegal	\$130	126.0	\$16,380.00
Natasha Bynum	Legal Clerk	\$95	71.1	\$6,754.50
Mahmoude Moasser	Paralegal	\$130	137.0	\$17,810.00
Rebecca Mitchell	Paralegal	\$115	9.0	\$1,035.00

Total Fees \$155,609.50

Total Hours 720.80

EXPENSE SUMMARY

Expense Category	Total Expenses
Outside Messenger	\$83.84
Auto Rental	\$146.47
Copies- Internal and Outside	\$5,028.21
Hotels	\$737.07
Facsimile	\$325.50
Lexis/Westlaw	\$858.53
Telephone	\$318.52
FedEx	\$870.26
Parking	\$18.00
Taxis/Miscellaneous Travel Expenses	\$483.00
Overtime Meals	\$20.57
Overtime Transportation	\$480.15
Secretarial Overtime	\$648.00
Postage	\$1.82
Total	\$10,019.94

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:) Chapter 11
)
W. R. GRACE & CO., et al.,¹) Case No. 01-01139 (JJF)
) (Jointly Administered)
)
Debtors.)

**VERIFIED APPLICATION OF WALLACE KING MARRARO & BRANSON FOR
COMPENSATION FOR SERVICES AND REIMBURSEMENT OF EXPENSES
AS SPECIAL COUNSEL TO W. R. GRACE & CO., ET AL., FOR
THE SEVENTH INTERIM PERIOD FROM OCTOBER 1, 2001 THROUGH
OCTOBER 31, 2001**

Pursuant to sections 327, 330 and 331 of title 11 of the United States Code (as amended, the “Bankruptcy Code”), Fed. R. Bankr. P. 2016, the Retention Order (as defined below), the Administrative Order Under 11 U.S.C. §§ 105(a) and 331 Establishing Procedures for Interim Compensation and Reimbursement of Professionals and Official Committee Members (the “Interim Compensation Order”) and Del.Bankr.LR 2016-2, the law firm of Wallace King Marraro & Branson PLLC (“WKMB”) as special litigation and environmental counsel for the above-captioned debtors and debtors in possession (collectively, “Debtors”) in connection with their chapter 11 cases, hereby

¹ The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-I Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food ‘N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Hornco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc., E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

applies for an order allowing it (i) compensation in the amount of \$95,842.90 for the reasonable and necessary legal services WKMB has rendered to the Debtors and (ii) reimbursement for the actual and necessary expenses that WKMB incurred in the amount of \$10,019.94 (the “Application”), in each case for the period from October 1, through October 31, 2001 (the “Fee Period”). In support of this Application, WKMB respectfully states as follows:

Retention of WKMB

1. On April 2, 2001 (the “Petition Date”), the Debtors each filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code (collectively, the “Chapter 11 Cases”). On April 2, 2001, the Court entered an order procedurally consolidating the Chapter 11 Cases for administrative purposes only. Since the Petition Date, the Debtors have continued to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. On April 12, 2001, the office of the United States Trustee appointed (i) a committee of unsecured creditors in the Chapter 11 Cases (the “Creditors’ Committee”), (ii) a committee of asbestos personal injury claimants (the “Asbestos Personal Injury Committee”) and (iii) a committee of asbestos property damage claimants (the “Asbestos Property Damage Committee.”). On June 18, 2001, the office of the United States Trustee appointed a committee of equity security holders (the “Equity Security Holders’ Committee,” collectively with the Creditors’ Committee, the Asbestos Personal Injury Committee and the Asbestos Property Damage Committee, the “Committees”).

2. By this Court’s order dated June 21, 2001, the Debtors were authorized to retain WKMB as their special counsel, effective as of the Petition Date, with regard to environmental and litigation matters (the “Retention Order”). The Retention Order authorizes the Debtors to

compensate WKMB at hourly rates charged by WKMB for services of this type and to be reimbursed for actual and necessary out-of-pocket expenses that it incurred, subject to application to this Court in accordance with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, all applicable local rules and orders of this Court.

3. The Retention Order also allowed for a special fee arrangement with the Debtors in connection with a pending litigation matter, *Interfaith Community Organization v. Honeywell International, Inc. et al* ("Honeywell litigation"). By Agreement with the Debtors, WKMB was entitled to receive its full standard hourly rates until June 21, 2001 when its standard hourly rates billed for the Honeywell litigation was reduced by 40% in return for an interest in the outcome of the Honeywell litigation. Thus, a 40% discount is applied to all professional fees billed to the Honeywell matter (Matter 6) after June 21, 2001.

4. As disclosed in the following affidavit:

Affidavit of Christopher H. Marraro in Support of Application for Order Under 11 U.S.C. § 327(a) and Fed. R. Bankr. P. 2014(a) Authorizing the Employment and Retention of Wallace King Marraro & Branson as Special Litigation and Environmental Counsel for the Debtors and Debtors in Possession (the "Original Affidavit"), filed June 4, 2001;

WKMB does not represent any interest adverse to the estates.

5. WKMB does not currently represent, but could in the future represent parties-in-interest in connection with matters unrelated to the Debtors and the Chapter 11 Cases. WKMB will update the Affidavits when WKMB becomes aware of material new information.

6. WKMB performed the services for which it is seeking compensation on behalf of the Debtors and their estates, and not on behalf of any committee, creditor or other person.

7. Pursuant to Fed. R. Bank. P. 2016(b), WKMB has not shared, nor has agreed to share, (a) any compensation it has received or may receive with another party or person other than with the partners, counsel and associates of WKMB, or (b) any compensation another person or party has received or may receive in connection with the Chapter 11 Cases.

8. This is the seventh application for interim compensation for services rendered that WKMB has filed with the Bankruptcy Court in connection with the Chapter 11 Cases.

Reasonable and Necessary Services Rendered by WKMB-- Generally

9. The WKMB attorneys who rendered professional services during this Fee Period are:

Name of Professional Person	Position with the applicant	Number of years as an attorney	Department	Hourly billing rate	Total billed hours	Total compensation
Christopher Marraro	Partner	18 Years	Litigation	\$420.00	80.90	\$33,978.00
William Hughes	Counsel	10 Years	Litigation	\$305.00	174.60	\$53,253.00
Tamara Parker	Associate	8 Years	Litigation	\$260.00	26.50	\$6,890.00
Angela Pelletier	Associate	3 Years	Litigation	\$200.00	91.10	\$18,220.00
Peter Condron	Counsel	13 Years	Litigation	\$335.00	2.50	\$837.50
Letta Sneed	Associate	4 Years	Litigation	\$215.00	2.10	\$451.50

10. The paraprofessionals of WKMB who have rendered professional services in these cases during this Fee Period are:

Name of Professional Person	Position with the applicant	Number of years in that position	Department	Hourly billing rate	Total billed hours	Total compensation
Barbara Banks	Paralegal	4 Years	Litigation	\$130.00	126.00	\$16,380.00

Name of Professional Person	Position with the applicant	Number of years in that position	Department	Hourly billing rate	Total billed hours	Total compensation
Natasha Bynum	Legal Clerk	1.5 Years	Litigation	\$95.00	71.10	\$6,754.50
Mahmoude Moasser	Paralegal	10 Years	Litigation	\$130.00	137.00	\$17,810.00
Rebecca Mitchell	Paralegal	1.5 Years	Litigation	\$115.00	9.0	\$1,035.00

Grand Total for Fees: \$155,609.50
Less 40% Discount on Honeywell Matter 6: (59,766.60)

Total Due \$ 95,842.90

11. WKMB has advised and represented the Debtors in connection with certain litigation and environmental matters. These matters include the Honeywell litigation, cost recovery litigation against other private parties and representation of the Debtors before the U.S. Environmental Protection Agency in connection with the Libby, Montana asbestos remediation matter.

12. The rates described above are WKMB 's hourly rates for services of this type. Attached as Exhibit A is a detailed itemization and description of the services that WKMB rendered during this Fee Period. Based on these rates and the services performed by each individual, the reasonable value of such services is \$155,609.50. The WKMB attorneys and paraprofessionals expended a total of 720.80 hours for these cases during this Fee Period. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, the amount of fees requested is fair and reasonable given: (a) the complexity of these cases, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under the Bankruptcy Code.

13. Further, Exhibit A (a) identifies the individuals that rendered services in each Subject Matter, as defined and described below, (b) describes each activity or service that each individual performed and (c) states the number of hours (in increments of one-tenth of an hour) spent by each individual providing the services. Each numbered tab in Exhibit A corresponds to the matter number that WKMB assigned to each Subject Matter. If a Subject Matter does not appear, then WKMB did not bill time or expenses for that Subject Matter during this Fee Period, but may bill time for that Subject Matter in the future.

Reasonable and Necessary Services Rendered by WKMB

Categorized by Matter

14. The professional services that WKMB rendered during the Fee Period are grouped into the numbered and titled categories of subject matters described in Paragraphs 15-19 herein (the "Subject Matter(s)").

15. Matter 6 – Honeywell litigation

(Fees: \$149,416.50-59,766.60=\$89,649.90, Hours: 699.30)

This Subject Matter involves time spent in litigation against Honeywell International, Inc. to recover substantial costs and damages and to compel Honeywell to clean up nearly a million tons of chromium process waste disposed of by a Honeywell predecessor, Mutual Chemical Company. Included is time preparing and filing motions, working on fact and expert discovery, undertaking factual and legal research and analysis and attending court hearings.

Matter 9 – Libby, Montana

(Fees: \$4,704.00; Hours: 11.20)

This Subject Matter describes activities concerning the representation of the Debtors before the U.S. Environmental Protection Agency relating to EPA's enforcement action concerning asbestos at Libby, Montana. Included is time for meetings with EPA and strategic planning.

16. Matter 4 – Brewer Road Litigation

(Fees: \$244.00; Hours: 0.80)

This Subject Matter describes services rendered in connection with litigation against Zotos International, Inc to recover several million dollars already expended by the Debtors in the environmental cleanup of a property in Western New York State.

17. Matter 5 – Motorwheel Superfund Site

(Fees: \$1,245.00; Hours: 9.50)

This Subject Matter involves time responding to issues relating to the amendment of a Consent Decree between the U. S. Environmental Protection Agency, the Debtors and other private parties concerning the Motorwheel Superfund Site located in Lansing, Michigan. Included is time related to advising the Debtors concerning the impact of the proposed amendment on their pending Third Circuit appeal and on future cost recovery actions against other responsible parties.

Actual and Necessary Expenses

19. It is WKMB's policy to charge its clients in all areas of practice for identifiable non-overhead expenses incurred in connection with the client's case that would not have been incurred except for representation of that particular client. It is WKMB's policy to charge its clients only the amount actually incurred by WKMB in connection with such items. Examples of such expenses are postage, overnight mail, courier delivery, transportation, overtime expenses, computer assisted legal research, photocopying, out-going facsimile transmissions, airfare, meals,

and lodging. With respect to airfare expenses, all travel, by all individuals, is billed at the coach class rate with allowances for class upgrades.

20. WKMB charges: (a) \$0.15 per page for duplication and (b) \$0.75 per page for outgoing telecopier transmissions (plus related toll charges). WKMB does not charge its clients for incoming telecopier transmissions. WKMB has negotiated a discounted rate for Lexis and Westlaw computer assisted legal research, which is approximately \$125/hour of online use of the standard Westlaw databases and approximately \$3.00/minute for Lexis databases. Computer assisted legal research is used whenever the researcher determines that using Lexis/Westlaw is more cost effective than using traditional (non-computer-based legal research) techniques.

21. A summary of expenses by type, as well as a detailed itemization and description of the disbursements made by WKMB on the Debtors' behalf during the Fee Period is attached hereto as Exhibit B. All of these disbursements comprise the requested sum for WKMB out-of-pocket expenses, totaling \$10,019.94. These disbursements are grouped in Exhibit B into the same numbered and titled categories of Subject Matters as the fees are grouped in Exhibit A. The numbered tabs within Exhibit B correspond to the numbers assigned to the matters described in Paragraphs 15-19 herein. Any missing Subject Matters merely indicate that no expenses were attributed to such Subject Matters during the Fee Period, although expenses may be attributable to such Subject Matters in the future. A summary of expenses by category for the entire Fee Period is also set forth in Exhibit B.

Representations

22. WKMB believes that the Application is in compliance with the requirements of Del.Bankr.LR 2016-2.

23. Although every effort has been made to include all fees and expenses from the Fee Period in the Application, some fees and expenses from the Fee Period might not be included in the Application due to accounting and processing delays. WKMB reserves the right to make further application to the Court for allowance of fees and expenses for the Fee Period not included herein.

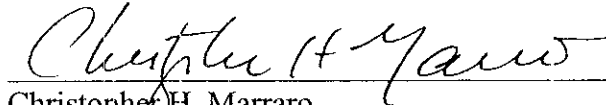
24. In summary, by the Application, WKMB requests compensation for fees and expenses in the total amount of \$105,862.84, consisting of (a) \$95,842.90 for reasonable and necessary professional services rendered and (b) \$10,019.94 for actual and necessary costs and expenses.

WHEREFORE, WKMB respectfully requests (a) that an allowance be made to it, as fully described above for the (i) 80% of the reasonable and necessary professional services WKMB has rendered to the Debtors during the Fee Period (\$76,674.32 after a discount credit for the Honeywell Matter 6 of \$59,766.60) and (ii) 100% of the reimbursement of actual and necessary costs and expenses incurred by WKMB during the Fee Period (\$10,019.94); (b) that both fees and expenses are payable as administrative expenses of the Debtors' estates; and (c) that this Court grant such further relief as is equitable and just.

Washington, D.C.
Dated: December 13, 2001

Respectfully submitted,

WALLACE KING MARRARO & BRANSON PLLC



Christopher H. Marraro
1050 Thomas Jefferson Street N.W.
Washington, D.C. 20007
(202) 204-1000

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:) Chapter 11
)
W. R. GRACE & CO., et al.,¹) Case No. 01-01139 (JJF)
) (Jointly Administered)
)
Debtors.)

VERIFICATION

Christopher H. Marraro, after being duly sworn according to law, deposes and says:

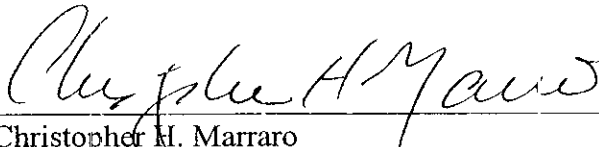
1. I am a partner with the applicant firm, Wallace King Marraro & Branson, PLLC and I am a member in good standing of the bars of the State of New Jersey and District of Columbia.

2. I have personally performed certain of, and overseen the legal services rendered by Wallace King Marraro & Branson PLLC as special litigation and environmental counsel

¹ The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-I Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc.), E&C Liquidating Corp., Emerson & Cuming, Inc., Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

to the Debtors and am thoroughly familiar with all other work performed on behalf of the Debtors by the lawyers and other persons in the firm.

3. The facts set forth in the foregoing Application are true and correct to the best of my knowledge, information and belief.

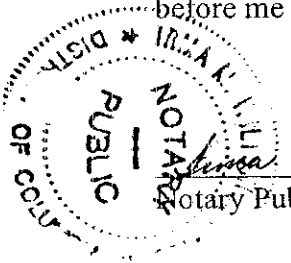


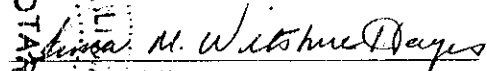
Christopher H. Marraro

In the District of Columbia

SWORN TO AND SUBSCRIBED

before me this 13th day of December 2001.





Katha K. Wilkins
Notary Public

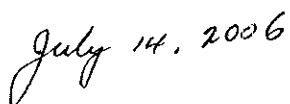
My Commission Expires: 

EXHIBIT A

**MATTER 6 - HONEYWELL
FEES - OCTOBER 2001**

Wallace
King
&
Marraro
Branson

WALLACE KING MARRARO & BRANSON, PLLC
1050 THOMAS JEFFERSON STREET, N.W.
WASHINGTON, DC 20007

Phone 202.204.1000
Fax 202.204.1001

December 13, 2001

W. R. Grace & Co.
Attention: Richard Senfleben
7500 Grace Drive
Columbia, MD 21044

Invoice #12497

For Professional Services Rendered in Connection with Honeywell, Inc. - Matter 6

Professional Services:

		<u>Hours</u>
10/01/01 MM	Continue to review case material and databases for any and all damage related material (1.1 hrs.); office conferences with Ms. Pelletier re searching case material and databases re disputed and undisputed facts as requested by Mr. Hughes to research (.3 hrs.); search case material, databases, Westlaw re same (7.3 hrs.).	8.70
AP	Review documents relating to purchase of property and Valley Fair construction incorporating same into pre-trial list of undisputed facts.	4.50
WH	Conferences with Ms. Banks and Ms. Pelleter re trial prep tasks (.9 hrs.); review selected documents for designation as trial exhibits (6.3 hrs.); review recent case correspondence and pleadings and confer with paralegal re filing/organizing same (.4 hrs.); legal research re evidentiary issue (1.2 hrs.); confer with Mr. Golliday re site remediation issue (.3 hrs.).	9.10

W. R. Grace & Co.

Page 2

		<u>Hours</u>
10/01/01 BB	Continue collecting, preparing, organizing and logging documents for trial exhibits (5.7 hrs.); research production database for documents regarding case witnesses for Mr. Marraro (2.0 hrs.); respond to inquiry from case expert and collect, scan and prepare email attachment for expert (.5 hrs.).	8.20
NAB	Pull and copy "Pre-trial" documents and add same to index (4.0 hrs.); incorporate case documents into electronic files and create hyperlink for same on the appropriate indices (1.2 hrs.)	5.20
10/02/01 TP	Office conference with Mr. Hughes re issue of whether a Honeywell expert can testify on a cost recovery issue (.5 hrs.); sent requests to legal assistants for materials needed in connection with this project (.2 hrs.); reviewed past briefs from other cases related to Daubert (2.8 hrs.); review of expert deposition transcript (3.6 hrs.).	7.10
NAB	Print photos of Mr. Marraro's "Site Visit" from CD and arrange for copies to be made in preparation to be used as trial exhibits (2.5 hrs.); assist Ms. Banks with print, preparing and chronning documents for Kevin T. O'Reilly's witness preparation binder (1.7 hrs.); incorporate case documents into electronic files and create hyperlink for same on the appropriate indices (3.5 hrs.)	7.70
MM	Continue to search Westlaw, Lexis-Nexis, case material and databases re various corporate information and other matters re disputed and undisputed facts raised by Mr. Hughes to be addressed; draft memorandum to Ms. Pelletier with results of research of same (3.6 hrs.).	3.60
WH	Conferences with Ms. Banks re collecting/organizing trial exhibits (.6 hrs.); review record for relevant DEP correspondence and other documents to be used in challenging Honeywell's costs (2.4 hrs.); confer with Ms.	7.70

W. R. Grace & Co.

Page 3

Hours

Koch re trial prep and assignment (.4 hrs.); confer with Mr. Marraro re trial prep issues (.4 hrs.); work on list of stipulated facts for pretrial order and confer with Ms. Pelletier re same (2.7 hrs.); reviewing deposition transcript re designations for trial (1.2 hrs.).

10/02/01 BB	Continue researching production and privilege documents databases for documents regarding case witness, prepare production and privilege documents indices, and gather, prepare, coordinate and organize witness binders for Mr. Marraro (7.7 hrs.); prepare call from case expert and consult with Mr. Hughes re call and assignment (.2 hrs.).	7.90
10/03/01 MM	Office conference with Ms. Pelletier re various task to be completed and results of the disputed and undisputed facts recently completed (.2 hrs.); e-mail to Ms. Flax re status of damage related issues (.2 hrs.); search case material and all databases re same (2.5 hrs.).	2.90
BB	Research , collect and prepare pertinent documents for Mr. Hughes re Daubert motion (.8 hrs.); return telephone call to case expert re outstanding 4/01 invoices and prepare email message to client re same for Mr. Hughes (.5 hrs.); review, analyze, coordinate, prepare and incorporate new case documents and correspondence into indexed case files and create new case files (5.7 hrs.); prepare and Bates label supplemental document production from defendant and prepare for shipment to case expert (.8 hrs.); prepare and incorporate new letters to the Court into electronic files and pleadings file (.5 hrs.).	8.30
NAB	incorporate case documents into electronic files and create hyperlink for same on the appropriate indices (2.0 hrs.); re-file case documents that were pulled to be copied in preparation for trial (1.8 hrs.); create files for	6.00

W. R. Grace & Co.

Page 4

		<u>Hours</u>
	incoming depositions and add same to case index and load onto Summation (2.2 hrs.)	
10/03/01	CHM Trial preparation meeting in New Jersey with J. Agnello.	8.60
	TP Reviewed expert report by Gayle Koch in rebuttal to Honeywell expert (.8 hrs.); completed review of expert transcript, performed Westlaw research on expert testimony for NCP compliance and began drafting memo related to potential arguments for motion to exclude (5.9 hrs.).	6.70
	WH Review documents produced by Honeywell for designation as trial exhibits (7.2 hrs.); work on document database (1.2 hrs.); conference with Mr. Schmiermund re expert work (.3 hrs.).	8.40
10/04/01	BB Incorporate additional letters to the Court into pleadings file and electronic case files (.8 hrs.); review, prepare and coordinate new correspondence, court transcript and case documents and incorporate into indexed case files (1.7 hrs.); Bates label supplemental production by defendant, prepare and incorporate into case files (1.9 hrs.); analyze and prepare update of status of provision of defendants' expert transcripts and supporting documents to case experts and arrange accordingly (.8 hrs.); read and digest produced related-litigation deposition transcript for Ms. Pelletier (1.5 hrs.).	6.70
	MM Telephone conference with Ms. Flax re various damage issues and other case projects (.3 hrs.); continue to review case material and databases re damage and disputed and undisputed matters (4.4 hrs.).	4.70
	NAB incorporate case documents into electronic files and create hyperlink for same on the appropriate indices (3.9 hrs.); copy and insert	6.70

W. R. Grace & Co.

Page 5

		<u>Hours</u>
	new errata and signature pages into depositions copied in for trial preparation (2.8 hrs.)	
10/04/01	WH Review depositions re designating transcripts for pretrial order (6.8 hrs.); review recent case correspondence and confer with firm members re same (.7 hrs.); confer with Ms. Shelnutt re trial prep issues and status of assignment (.4 hrs.).	7.90
	TP Added cites to Honeywell expert transcript that related to issues for exclusion to memo, reviewed and summarized cases found and emailed to Mr. Hughes (4.7 hrs.); reviewed various incoming correspondence including hearing transcript re discovery issue and bankruptcy stay (.8 hrs.).	5.50
	AP Review documents and incorporate key facts into draft pre-trial submission.	8.00
10/05/01	TP Conducted additional research re NCP compliance issue for purposes of motion to exclude (4.2 hrs.); began updated memo (2.0 hrs.).	6.20
	WH Review documents for designation as trial exhibits (4.8 hrs.); conferences with Ms. Banks re collection of trial exhibits and other assignments (.9 hrs.); legal research re evidentiary issue in connection with preparing pretrial order (.8 hrs.); work on database for trial exhibits (2.2 hrs.).	8.70
	AP Review documents and incorporate key facts into draft pre-trial submission.	5.50
	NAB incorporate case documents into electronic files and create hyperlink for same on the appropriate indices (6.3 hrs.); file and add new documents to case indices (1.6 hrs.).	7.90
	MM Office conference with Ms. Pelletier re various task to be researched and reviewed re disputed an undisputed facts as well as damages (.2	3.60

W. R. Grace & Co.

Page 6

Hours

hrs.); follow-up office conference with Ms. Pelletier re utilizing Microsoft access to prepare various charts and reports relating to human health and environmental issues (.2 hrs.); office conference with Mr. Kaider re same (.1 hrs.); continue to review databases relating to previously stated issues and facts (3.1 hrs.).

10/05/01 BB	Read, analyze, sort and organize new correspondence and case documents, index and incorporate into existing case files and create new files.	4.10
10/08/01 BB	Respond to telephone inquiry from case expert re defendant's expert deposition transcript, exhibits and supporting documents (.3 hrs.); review and prepare duplicates of defendant's expert deposition exhibits and supporting documents (1.2 hrs.); research production files for pertinent site survey map for case expert (.3 hrs.); collect, prepare, and organize defendant's expert documents, deposition transcripts and exhibits and prepare cover letter and document package to case expert for Mr. Marraro (1.6 hrs.); incorporate new correspondence into indexed case files (.8 hrs.).	4.20
WH	Review documents re human health issue for designation as trial exhibits revising database entries re same.	7.70
CHM	Review transcripts of depositions for designations (3.0 hrs.); conference call with client (.5 hrs.).	3.50
MM	Office conference with Mr. Marraro re status of damage claims (.1 hrs.); office conference with Ms. Pelletier re disputed and undisputed facts (.1 hrs.); continue to work Microsoft Access in preparation of producing reports detailing human health and environmental issues (1.2 hrs.); continue to review various	3.80

W. R. Grace & Co.

Page 7

		<u>Hours</u>
	databases re disputed and undisputed facts as well as damage related issues (2.4 hrs.).	
10/08/01 NAB	incorporate case documents into electronic files and create hyperlink for same on the appropriate indices (3.9 hrs.); file and add new case documents to case indices (2.2 hrs.); prepare rebuttal expert documents to be sent to Peter Chapman (1.2 hrs.).	7.30
10/09/01 MM	Continue to review various case materials and databases re locating all damage relating documents as well as searching for disputed and undisputed facts for clarification and utilizing micro-soft access for future charts of same (6.1 hrs.); office conference with Ms. Pelletier re same (.1 hrs.).	6.20
BB	Analyze deposition materials to be sent to each case expert for trial preparation, prepare cover letters and documents for shipment and update log of materials sent and needed (7.3 hrs.); place call to plaintiff for omitted deposition exhibits (.2 hrs.); consult with Mr. Hughes re review of collected case documents for trial exhibits (.1 hrs.); collect, collate deposition transcripts and exhibits for defendants' expert and prepare cover letter and package for case expert for Mr. Marraro (.7 hrs.).	8.30
WH	Supplement list of factual stipulations for inclusion in pretrial order (3.3 hrs.); review documents for designation as trial exhibits (3.8 hrs.); work on database entries (.8 hrs.).	7.90
CHM	Prepare fee application.	1.80
10/10/01 CHM	Meeting with three possible trial witnesses in New York.	7.20
BB	Continue incorporating new case documents into indexed case files and create new case files (6.4 hrs.); review with Mr. Moasser documents, deposition transcripts and exhibits	7.10

W. R. Grace & Co.

Page 8

		<u>Hours</u>
	to be sent to case experts and status chart (.7 hrs.).	
10/10/01 WH	Conference with Messrs. Brown and Golliday re excavation issue and trial prep matters (.6 hrs.); review materials from Mr. Golliday re remediation issue (.6 hrs.); review and designate documents for use as trial exhibits (5.8 hrs.); revise draft pretrial order (.4 hrs.).	7.40
MM	Continue to review databases for any and all disputed and undisputed facts as well as all damage related documents (1.4 hrs.); office conference with Ms. Banks re producing various documents to be forwarded to experts (.3 hrs.); office conference with Mr Hughes and Ms. Pelletier re same (.2 hrs.); continuing working with Microsoft access re producing charts and reports for health relating matters(.4 hrs.); review executed errata sheet received from Dr. Ronal Schmiermund pertaining to his July 27, 2001 deposition and produce copy of same to correspondence file (.2 hrs.); draft fax cover sheet and forward copy of same with cover letter to court reporter , Howard Rappaport for filing (.3 hrs.); draft fax cover sheet for same to all counsels (.2 hrs.); review and revise expert report files (.2 hrs.); in preparation of forwarding various documents to experts, review case material and produced all requested material and organize them all for forwarding, pending completion (4.7 hrs.).	7.90
10/11/01 WH	Review documents for designation as trial exhibits (4.9 hrs.); prepare database entries re database of trial exhibits (3.4 hrs.).	3.30
PCC	Review answers re ownership of Route 440 site (1.0 hrs.); memo to Mr. Marraro re same and meet with Mr. Marraro (.5 hrs.).	1.50
MM	Telephone conferences with Mr. Marraro re searching databases for specific letter dated 6/18/80 (.2 hrs.); search case material and databases and produced stated letter (.4 hrs.);	7.60

W. R. Grace & Co.

Page 9

		<u>Hours</u>
	fax letter to Mr. Marraro at Carella Byrne (.2 hrs.); finalize review and gathering of various documents requested by Mr. Marraro and FedEx to various experts for their review (3.4 hrs.); telephone conference with Ms. Banks re documents to be sent to Dr. Valera (.1 hrs.); review and revise Grace experts contact information re material previously sent to them (.7 hrs.); continue to review case material and databases relating to disputed and undisputed facts and damage relating issues (1.9 hrs.).	
10/11/01	CHM Trial preparation session with Mr. Agnello in New Jersey.	6.20
	NAB Incorporate case documents into electronic files and create hyperlink for same on the appropriate indices (2.2 hrs.); file and add new documents to case indices (2.2 hrs.).	4.40
10/12/01	WH Review correspondence from Honeywell re Peter Deming's expert files and review new documents produced therewith (6.4 hrs.); conferences with paralegals re review of revised Mueser Rutledge privilege log and new Mueser documents produced by Honeywell (.8 hrs.); review relevant portions of Mr. Deming's deposition re his reliance on privileged documents (.6 hrs.).	7.80
	AP Draft undisputed facts portion of pre-trial submission.	3.50
	MM Office conference with Ms. Pelletier re various matters dealing with disputed and undisputed fact and other case miscellaneous matters (.2 hrs.); continue to review case material and databases re identifying disputed and undisputed facts as well as any damage related issues (3.7 hrs.).	3.90
10/15/01	WH Review documents for designation as trial exhibits (4.2 hrs.); prepare database entries re database of trial exhibits (2.8 hrs.); revisions to	8.90

W. R. Grace & Co.

Page 10

		<u>Hours</u>
	draft pretrial order (.6 hrs.); work on deposition designations for pretrial order (1.3 hrs.).	
10/15/01 BB	Research production database and case index, collect and prepare pertinent property transfer documents for Mr. Marraro (2.1 hrs.); review, analyze, coordinate, organize and incorporate new case correspondence, pleading and documents into existing case files and create new case files (5.3 hrs.); return calls to expert re deposition invoice for Mr. Hughes and consult with Mr. Hughes re same (.2 hrs.); review and analyze new expert invoices, coordinate, incorporate into case files and update summary chart of payments to date for Mr. Hughes (.5 hrs.).	3.10
PCC	Prepare materials for Mr. Marraro regarding ownership of Route 440 site.	1.00
NAB	Search pleadings index for all documents pertaining to history of the Grace/Channel Home/ECARG 1986 and 1984 transfer (4.6 hrs.); incorporate case documents into electronic files and creat hyperlink for same on the appropriate indices (2.9 hrs.).	7.50
MM	Office conference with Ms. Pelletier re various matters re disputed and undisputed facts as well as damage issues (.2 hrs.); review various case documents re same (1.6 hrs.).	1.80
10/16/01 WH	Conference with Julio Valera regarding Deming documents and assignment re same (.6 hrs.); review additional Mueser Rutledge documents produced by Honeywell (1.3 hrs.); work on pretrial order (2.4 hrs.); collect trial exhibits (.8 hrs.); work on deposition designations (1.1 hrs.).	6.20
CHM	Meeting with experts in New Jersey (7.5 hrs.); conference call with H. McGuire (.5 hrs.).	8.00

W. R. Grace & Co.

Page 11

		<u>Hours</u>
10/16/01	AP Review chrome toxicity documents and incorporate into pre-trial list of undisputed facts.	7.50
	NAB Chron and Index "Deeds and Leases" file.	3.50
	BB Analyze, sort, organize and incorporate new documents and correspondence into indexed existing case files and create new files (7.4 hrs.); respond to call from case expert re payment of invoice and consult with Mr. Hughes re same (.2 hrs.); prepare email letter to client re status of payments to experts (.2 hrs.); consult with Mr. Hughes re documents and transcripts sent to experts and preparation of trial exhibits (.3 hrs.); review invoices received to date and consult with Ms. Campbell re progress on collection of expert deposition invoices and prepare summary for file (1.0 hrs.); respond to email from client re expert invoice payments (.2 hrs.).	9.30
10/17/01	NAB Cross-reference documents listed on Honeywell's privilege log against production databases (2.4 hrs.); print documents from production CDs re same(.5 hrs.); prepare memo to Mr. Hughes re same (.5 hrs.).	3.40
	AP Calls with EVS regarding invoicing of P. Chapman deposition time (.5 hrs.); meet with C. Marraro and B. Hughes re pre-trial preparation (.5 hrs.); review NJDEP correspondence and incorporate into pre-trial submission (7.1 hrs.).	3.10
	CHM Review and edit stipulation for Bankruptcy Court (.5 hrs.); prepare letter to Lowenstein (.8 hrs.); conference with client (.5 hrs.); review letter from plaintiff re stipulation (.5 hrs.).	2.30
	BB Research case files and analyze pertinent documents re property transfer issues for Messrs. Marraro and Hughes and report findings and confer with Mr. Hughes re same (1.5 hrs.); collect and prepare pertinent	7.70

W. R. Grace & Co.

Page 12

Hours

document for Mr. Marraro (.2 hrs.); prepare and organize documents pertinent to issue of property transfer for Mr. Hughes (.7 hrs.); respond to email message from client re status of payments to experts, analyze pending invoices and respond to client and prepare fax of documents re same (.9 hrs.); consult with Ms. Campbell re in-house record of expert invoices (.4 hrs.); analyze record and prepare email response to expert re status of his payments (.4 hrs.); incorporate new correspondence and case documents into indexed case files and create new files (3.3 hrs.); collect and prepare document for Mr. Hughes (.3 hrs.).

10/17/01 WH	Conference with Mr. Marraro re further briefing on Grace & Co. owner/operator issue (.3 hrs.); legal research re CERCLA and RCRA owner/operator issues (4.4 hrs.); conference with Messrs. Marraro and Agnello re research (.4 hrs.); meetings with Mr. Marraro and Ms. Pelletier re status of pretrial work (.6 hrs.); work on database of trial exhibits and cross-examination materials (2.7 hrs.).	3.40
10/18/01 BB	Review, organize and incorporate defendant's expert supporting documents into indexed case files and create new files (8.9 hrs.); review and quality check Ms. Bynum's results of cross referencing of defendant's revised privilege log against production documents for Mr. Hughes (.6 hrs.).	9.50
TP	Reviewed file to determine whether disk containing data had been provided (.2 hrs.); calls to Dr. Anderson and Mr. Lape to obtain electronic version of data (.2 hrs.).	0.40
AP	Draft pre-trial factual issues submission based on review of toxicity data and mutual documents.	7.40

W. R. Grace & Co.

Page 13

		<u>Hours</u>
10/18/01	NAB Cross-reference documents listed on Honeywell's privilege log against production databases (5.6 hrs.); print documents from production CDs re same (1.0 hrs.); prepare memo to Mr. Hughes re same (.9 hrs.).	7.50
	WH Draft letter to Judge Cavanaugh re owner/operator issue (1.0 hrs.); further legal research re RCRA and CERCLA owner/operator issues (3.6 hrs.); confer with Mr. Agnello re letter to Judge Cavanaugh (.3 hrs.); legal research re evidentiary issue in connection with pretrial order (.6 hrs.); collect trial exhibits and revise database re same (3.1 hrs.).	8.60
	MM Review all incoming correspondence received recently (.4 hrs.); continue to review case databases re various damage and disputed and undisputed facts per Ms. Pelletier's request (3.5 hrs.).	3.90
10/19/01	CHM Prepare fee application (September).	1.50
	CHM Site visit to confirm existing conditions.	3.50
	BB Review supplemental production of documents for expert received from defendant, coordinate, organize and incorporate into indexed case files (5.3 hrs.); review supplemental production of site photos and videotapes received from defendant, and arrange for duplication (.3 hrs.).	5.60
	MM Office conferences with Ms. Pelletier re producing various documents from case databases (.2 hrs.); preliminary search of case databases re same (6.6 hrs.); telephone conferences with J. Busbea re producing clean copies of various documents requested by Ms. Pelletier (.2 hrs.); review box of material received from Dr. Valera (.2 hrs.); draft e-mail memorandum to Mr. Hughes and Ms. Pelletier re advising that the material received from Dr. Valera was sent per the instructions of Ms.	8.10

W. R. Grace & Co.

Page 14

		<u>Hours</u>
	Banks (.4 hrs.); review daily correspondence (.5 hrs.).	
10/19/01 AP	Draft pre-trial factual issues submission based on review of toxicity data and "HH" coded documents (relating to human health) (8.2 hrs.); conference with M. Moasser re need for clearer copies of certain illegible mutual documents (.4 hrs.).	8.60
NAB	Cross-reference documents listed on Honeywell's privilege log against production databases (3.0 hrs.); print documents from production CDs re same (.5 hrs.); prepare memo to Mr. Hughes re same (.5 hrs.).	4.00
10/20/01 MM	Continue to search case databases re producing various documents for Ms. Pelletier's review.	6.00
10/22/01 MM	Office conferences with Ms. Pelletier re drafting in filing form Honeywell's admitted admissions, including deemed admissions as well as continuing to search case databases (i.e., disk) and produce copies of various documents for her review (.3 hrs.); produce same with memorandum to Ms. Pelletier (2.2 hrs.); continue to search databases for above stated documents (8.6 hrs.); office conference with Mr. Hughes re trial prep and other miscellaneous task to be completed (.2 hrs.).	11.30
CHM	Review list of legal issues from W. Hughes (re pre-trial (1.5 hrs.)); conference with J. Agnello (.5 hrs.); review deposition transcripts for designations (1.5 hrs.).	3.50
WH	Review draft list of factual stipulations for pretrial order prepared by Ms. Pelletier and revise same (6.6 hrs.); review sampling data provided by non-testifying expert and incorporate into collection of trial exhibits (2.1 hrs.).	8.70

W. R. Grace & Co.

Page 15

		<u>Hours</u>
10/22/01	TP Telephone conference and email with Messrs. Lape and Marraro re Dr. Anderson's computer model and review of file to determine if previously produced.	0.60
	BB Create new case files and incorporate into existing case files.	2.60
	LS Legal research re Daubert challenge to disqualify experts.	2.10
	AP Calls and email with S. Shellnut relating to toxicological properties of chromium (.6 hrs.); draft pre-trial factual issues submission based on review of documents relating to leasing and construction on site (4.5 hrs.); review additional NJDEP documents for incorporation into pre-trial list of factual issues (3.0 hrs.).	8.10
10/23/01	BB Return call to case expert (.1 hrs.); prepare e-mail to expert re trial preparation for Mr. Hughes (.1 hrs.); collect and prepare pertinent bankruptcy document for Mr. Marraro re conference (.2 hrs.); collect and prepare case documents for Ms. Pelletier (.1 hrs.).	0.50
	AP Review and revise S. Shellnut draft of toxicological portion of pre-trial submission (.7 hrs.); email and conference with M. Moasser re instructions for locating relevant patent and health documents (.6 hrs.); draft pre-trial factual issues submission based on review of DEP directives, Allied patent applications, and deposition testimony of Honeywell witness (6.7 hrs.).	8.00
	WH Draft letter to Mr. Caffrey re production of Dr. Valera's documents (.4 hrs.); confer with Dr. Valera re documents (.3 hrs.); legal research re assertion of privilege over documents prepared by testifying expert (.7 hrs.); review documents re Allied/Mutual's knowledge of chromium health effects for use as trial exhibits (5.3 hrs.); confer with Ms. Pelletier and Ms. Shelnut re	8.40

W. R. Grace & Co.

Page 16

Hours

	same (.4 hrs.); research re RCRA liability standards (1.3 hrs.).	
10/23/01 MM	Review recently received correspondence distributed by Ms. Campbell (.3 hrs.); telephone conference with Ms. Jeanne Busbea re producing clean copies of various AS DOCS per Ms. Pelletier's request (.2 hrs.); forward e-mail to Ms. Busbea with detailed list of all documents to be produced (.2 hrs.); office conferences with Ms. Pelletier re status of same and other various task to be completed (.3 hrs.); preliminary search of case databases re producing various patent documents for Ms. Pelletier (.8 hrs.); continue to search databases (i.e., disk containing AS DOCS, BALI; GRA; and Chrom data) and produce various documents requested by Ms. Pelletier (4.6 hrs.); case management (.7 hrs.).	7.10
CHM	Review ECARG, Channel Home transfer documents (.5 hrs.); conference with J. Agnello (.5 hrs.); meeting with plaintiffs' counsel (1.5 hrs.).	3.50
10/24/01 BB	Consult with Ms. Kelley and Mr. Hughes re CD received from defendant and review CD and arrange print out for case expert's review and file (.5 hrs.); incorporate new production documents from defendant into indexed ase files (3.5 hrs.); incorporate new correspondence into indexed case files (2.3 hrs.); collect and prepare documents and records for Mr. Hughes re trial exhibit review (.4 hrs.).	6.70
CHM	Prepare deposition designations of expert witnesses (2.5 hrs.); conference with W. Hughes and A. Pelletier re schedule (.6 hrs.); conference with expert witnesses re exhibits from some experts (.8 hrs.); prepare letter to M. Caffrey re discovery (.5 hrs.); conference with J. Agnello (.5 hrs.).	8.10

W. R. Grace & Co.

Page 17

		<u>Hours</u>
10/24/01	WH Review additional Deming expert documents on CD produced by Honeywell (2.4 hrs.); confer with Dr. Valera re review of same (.3 hrs.); work on in limine motion re Honeywell expert (4.3 hrs.); work on database of exhibits/cross-examination materials (1.6 hrs.).	8.60
	AP Draft pre-trial submission, based on review of deposition testimony, previous Grace pleadings and briefs, Allied patents, animal studies relating to effects of chromium (9.4 hrs.).	9.40
	MM Follow-up with Ms. Busbea via e-mail re producing requested clean copies of various documents requested by Ms. Pelletier (.2 hrs.); continue to search case databases and produce various U.S. patents and forward to Ms. Pelletier with memorandum for review (1.9 hrs.); review all incoming correspondence received from Ms. Campbell (.3 hrs.); office conference with Mr. Kaider re compiling case data per Ms. Pelletier's request (.4 hrs.); follow-up telephone conference with Ms. Pelletier re same (.2 hrs.); search case material and obtain copy of complaint and agreement filed by Daylin against Goodrich and forward all to Ms. Pelletier (.4 hrs.); additional search for various dates, and other miscellaneous details for Ms. Pelletier (.9 hrs.); continue to search databases (i.e., disk containing AS DOCS, BALI; GRA; and Chrom data) and produce various documents requested by Ms. Pelletier (5.2 hrs.); office conference with Ms. Banks re various matters to be produced (.3 hrs.).	9.80
10/25/01	CHM Review status of expert invoices (1.0 hrs.); conference with several experts re same (.5 hrs.); conference with client (.3 hrs.).	1.80
	WH Review memorandum from paralegal re comparison of MR's privilege logs and produced documents and confer with Ms. Banks re same (1.8 hrs.); review new case correspondence and confer with Ms. Pelletier	7.80

W. R. Grace & Co.

Page 18

Hours

and Mr. Marraro re same (.8 hrs.); review documents and prepare list of proposed stipulations re DEP's rejection of various actions undertaken by Honeywell in connection with remediation of the site (3.8 hrs.); work on in limine motion re expert (1.4 hrs.).

10/25/01 AP	Review and revise pre-trial list of disputed facts (3.0 hrs.); work on pre-trial list of legal issues per instructions of B. Hughes (2.3 hrs.).	5.30
-------------	---	------

MM	Office conferences with Ms. Pelletier re status of various projects and taking on additional ones (.3 hrs.); review e-mail from Ms. Pelletier (.1 hrs.); search Westlaw and produce documentation supporting same and forward all to Ms. Pelletier with memorandum for review (1.2 hrs.); office conferences with Mr. Marraro re producing all Chicago Tile Search material as well as any other title searches completed to date (.2 hrs.); search case material and databases re same and produce all redwells to M. Marraro for review (.6 hrs.); produce copies of the declaration of Elizabeth Anderson with complete exhibits as well as the search and produce Statement of Financial Affairs relating to ECARG, Inc.'s Bankruptcy as well as for W.R. Grace & Co. and forward all to Ms. Pelletier with memorandum for review (1.6 hrs.); review recently received correspondence distributed by Ms. Campbell (.2 hrs.); follow-up with Ms. Busbea re status of producing requested documents that were not legible per Ms. Pelletier's request (.1 hrs.); continue to search databases (i.e., disk containing AS DOCS, BALI; GRA; and Chrom data) and produce various documents requested by Ms. Pelletier (5.7 hrs.); case management (.6 hrs.).	10.60
----	--	-------

W. R. Grace & Co.

Page 19

		<u>Hours</u>
10/26/01	AP Work on pre-trial list of legal issues (1.7 hrs.); read deposition of A. Sebian (1.4 hrs.); review and designate excerpts from testimony of T. Berner (2.1 hrs.).	5.20
	WH Confer with Mr. Golliday re trial prep issue (.3 hrs.); confer with Dr. Valera re new documents produced by Mr. Deming (.4 hrs.); work on pretrial order (1.7 hrs.).	2.40
	MM Review requested documents from Jeanne Busbea and forward copy of same to Ms. Pelletier detailing results of Ms. Busbea's results (.6 hrs.); continue to search databases (i.e., disk containing AS DOCS, BALI; GRA; and Chrom data) and produce various documents requested by Ms. Pelletier (3.1 hrs.); case management (.7 hrs.).	4.40
10/27/01	MM Continue to search databases (i.e., disk containing AS DOCS, BALI; GRA; and Chrom data) requested by Ms. Pelletier (4.1 hrs.); review and organize documents produced as a result of document search (1.9 hrs.).	6.00
10/28/01	MM Review and organize produced documents from search of databases (i.e., disk containing AS DOCS, BALI; GRA; and Chrom data) requested by Ms. Pelletier (4.0 hrs.).	4.00
10/29/01	CHM Finalize September fee application.	0.60
	BB Review, sort and organize new correspondence and case documents (3.9 hrs.); incorporate additional deposition exhibits into deposition files (1.8 hrs.).	5.70
	WH Review documents produced by Honeywell for designation as trial exhibits (4.2 hrs.); work on database re trial exhibits/cross-x materials (3.8 hrs.); conferences with Ms. Banks re collection and review of exhibits (.7 hrs.).	8.70

W. R. Grace & Co.

Page 20

		<u>Hours</u>
10/29/01	AP Review "HH" coded documents from Grace database (related to human health) (2.0 hrs.).	2.00
	MM Review recent correspondence (.3 hrs.); finalize search of databases for various documents requested by Ms. Pelletier (2.9 hrs.); review and organize documents from search (1.1 hrs.).	4.30
10/30/01	BB Prepare email messages to local counsel and forward scanned bankruptcy documents for Mr. Marraro (1.3 hrs.); scan and incorporate into electronic case files additional bankruptcy documents (.6 hrs.); investigate status of expert's outstanding invoice, prepare and consult with Mr. Hughes and Ms. Campbell re status and resolution (.4 hrs.); review, organize and prepare deposition transcripts for deposition designations for trial for Ms. Pelletier (2.4 hrs.); review and analyze new correspondence and incorporate into indexed case files (2.5 hrs.).	7.20
	CHM Review letter to Judge Cavanaugh (.5 hrs.); conference with plaintiffs' counsel re same (.3 hrs.); conference with Dr. Goad re DEP meeting (.5 hrs.); reivew Dr. Goad's notes re DEP/Honeywell meeting (.3 hrs.); continue with deposition designations (3.2 hrs.); conference with client re various matters (.7 hrs.); conference with expert re various matters (.5 hrs.).	5.90
	MM Finalize the organization of documents produced from various case databases and forward all with memorandum to Ms. Pelletier for review (2.4 hrs.).	2.40
	WH Collect trial exhibits and work on database of trial exhibits and cross-examination materials.	7.80
10/31/01	CHM Conference with several experts (1.5 hrs.); conference with client (.3 hrs.); meeting with plaintiffs' counsel on various issues (1.4 hrs.).	3.20

W. R. Grace & Co.

Page 21

		<u>Hours</u>	
10/31/01	WH	Review documents for designation as trial exhibits (4.7 hrs.); prepare database entries re database of trial exhibits (3.7 hrs.).	8.40
	MM	Review recently received correspondence distributed by Ms. Campbell (.3 hrs.); case management (.3 hrs.); office conference with Ms. Pelletier re various matters relating to documents produced recently from Grace databases (.2 hrs.); follow-up search of Grace databases for additional documents requested by Ms. Pelletier (3.6 hrs.).	4.40
	BB	Review, verify, collect and prepare deposition transcripts for review for trial designations for Ms. Pelletier (2.4 hrs.); incorporate new correspondence into indexed case files and create new case files (3.2 hrs.); review documents from defendant's supplemental CD production and incorporate (.8 hrs.); prepare letter and Fed Ex package to expert forward CD and documents printed from CD for Mr. Hughes (.7 hrs.); collect pertinent site documents from production files and add to frequently used binder (.8 hrs.); consult with Mr. Hughes and Ms. Campbell re expert invoice (.4 hrs.).	8.30
			<u>Amount</u>
Total Fees		699.30	\$149,416.50
10/31/2001	Less Deduction of 40% of Fees Per Agreement		(\$59,766.60)
Balance Due			<u>\$89,649.90</u>

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>
Barbara Banks, Paralegal	126.00	130.00
Natasha A. Bynum, Legal Clerk	71.10	95.00
Peter C. Condron, Counsel	2.50	335.00
William Hughes, Counsel	173.80	305.00
Christopher H. Marraro, Partner	69.20	420.00

W. R. Grace & Co.

Page 22

<u>Name</u>	<u>Hours</u>	<u>Rate</u>
Mahmoude Moasser, Paralegal	137.00	130.00
Tamara Parker, Associate	26.50	260.00
Angela Pelletier, Associate	91.10	200.00
Letta Sneed, Associate	2.10	215.00

MATTER 9 - LIBBY, MT.
FEES - OCTOBER 2001

Wallace
King
&
Marraro
Branson

WALLACE KING MARRARO & BRANSON, PLLC
1050 THOMAS JEFFERSON STREET, N.W.
WASHINGTON, DC 20007

Phone 202.204.1000
Fax 202.204.1001

December 13, 2001

W. R. Grace & Co.
Attention: William Corcoran
Vice President-Public & Regulatory Affairs
7500 Grace Drive
Columbia, MD 21044

Invoice #12498

For Professional Services Rendered in Connection with Libby, Montana - Matter 9

Professional Services:

		<u>Hours</u>	
10/01/01	CHM Prepare for meeting (2.0 hrs.); pre-meeting with W. Corcoran (1.4 hrs.); meeting with EPA (1.3 hrs.); post meeting (1.8 hrs.); conference call with Spinello re follow-up (.5 hrs.).	7.00	
10/04/01	CHM Conference with J. Spinello (.4 hrs.); conference with W. Corcoran re same (.3 hrs.).	0.70	
10/08/01	CHM Review Libby articles from Grace.	0.50	
10/09/01	CHM Review articles from Grace (.5 hrs.); conference with W. Corcoran (.2 hrs.).	0.70	
10/16/01	CHM Review Libby articles.	0.50	
10/19/01	CHM Conference call with W. Corcoran (.3 hrs.); prepare letter to J. Spinello (.3 hrs.); review three articles from Grace (.5 hrs.).	1.30	
10/29/01	CHM Review various articles from Grace.	0.50	
			<u>Amount</u>
	Total Fees	11.20	\$4,704.00

W. R. Grace & Co.

Page 2

<u>Name</u>	Timekeeper Summary	<u>Hours</u>	<u>Rate</u>
Christopher H. Marraro, Partner		11.20	420.00

**MATTER 4 - WATERLOO
FEES - OCTOBER 2001**

Wallace
King
&
Marraro
Branson

WALLACE KING MARRARO & BRANSON, PLLC
1050 THOMAS JEFFERSON STREET, N.W.
WASHINGTON, DC 20007

Phone 202.204.1000

Fax 202.204.1001

December 13, 2001

W. R. Grace & Co.
Attention: Akos L. Nagy
7500 Grace Drive
Columbia, MD 21044

Invoice #12499

For Professional Services Rendered In Connection with Waterloo - Brewer Road Site - Matter 4

Professional Services:

		<u>Hours</u>
10/09/01	WH Review Zotos' filing re motion to amend (.5 hrs.); confer with Mr. Hogan re same (.3 hrs.).	0.80

	<u>Hours</u>	<u>Amount</u>
Total Fees	0.80	\$244.00

Timekeeper Summary		
<u>Name</u>	<u>Hours</u>	<u>Rate</u>
William Hughes, Counsel	0.80	305.00

**MATTER 5 - MOTORWHEEL
FEES - OCTOBER 2001**

Wallace
King
&
Marraro
Branson

WALLACE KING MARRARO & BRANSON, PLLC
1050 THOMAS JEFFERSON STREET, N.W.
WASHINGTON, DC 20007

Phone 202.204.1000
Fax 202.204.1001

December 13, 2001

W. R. Grace & Co.
Attention: Lydia Duff, Esq.
7500 Grace Drive
Columbia, MD 21044

Invoice #12500

For Professional Services Rendered in Connection with the Motor Wheel Site - Matter 5

Professional Services:

		<u>Hours</u>
10/08/01 RM	Copy and send Opinion in Motor Wheel decision to Ms. Hannah for Mr. Kampman, write cover letter for same.	0.80
10/12/01 CHM	Conference with Kirkland & Ellis re various issues.	0.50
10/19/01 RM	Prepare files for off-site shipment (.8 hrs.); file miscellaneous pleadings and correspondence, duplicates, and lawyer research (1.3 hrs.); confer with Ms. Pelletier and Mr. Marraro (.4 hrs.).	2.50
10/24/01 RM	Update case files (3.2 hrs.); review case files, prepare for Off-Site shipment, index boxes for Off-Site resource (2.5 hrs.).	5.70
		<u>Amount</u>
Total Fees		9.50 \$1,245.00

W. R. Grace & Co.

Page 2

Timekeeper Summary		
<u>Name</u>	<u>Hours</u>	<u>Rate</u>
Christopher H. Marraro, Partner	0.50	420.00
Rebecca Mitchell, Paralegal	9.00	115.00

EXHIBIT B

EXPENSE SUMMARY

Expense Category	Total Expenses
Outside Messenger	\$83.84
Auto Rental	\$146.47
Copies- Internal and Outside	\$5,028.21
Hotels	\$737.07
Facsimile	\$325.50
Lexis/Westlaw	\$858.53
Telephone	\$318.52
FedEx	\$870.26
Parking	\$18.00
Taxis/Miscellaneous Travel Expenses	\$483.00
Overtime Meals	\$20.57
Overtime Transportation	\$480.15
Secretarial Overtime	\$648.00
Postage	\$1.82
Total	\$10,019.94

**MATTER 6 - HONEYWELL
EXPENSES - OCTOBER 2001**

Wallace
King
&
Marraro
Branson

WALLACE KING MARRARO & BRANSON, PLLC
1050 THOMAS JEFFERSON STREET, N.W.
WASHINGTON, DC 20007

Phone 202.204.1000
Fax 202.204.1001

December 13, 2001

W. R. Grace & Co.
Attention: Richard Senfleben
7500 Grace Drive
Columbia, MD 21044

Invoice #12497

For Professional Services Rendered in Connection with Honeywell, Inc. - Matter 6

Disbursements:

	<u>Amount</u>
Auto Rental re Delaney deposition - 9/15/01	146.47
Copy Costs - Internal	3,190.35
Delivery Service	83.84
Facsimile Costs	300.75
FedEx Costs	848.30
Hotel re Prep Session and Deposition for Koch	737.07
Long Distance Charges	318.52
Outside Copies	1,825.86
Overtime Meals	20.57
Overtime Transportation	480.15
Parking on trips	18.00
Postage	1.82
Secretarial Overtime	648.00
Travel Expenses for Meeting with J. Agnello for Trial Prep	483.00
Westlaw	858.53
Total Disbursements	<u>\$9,961.23</u>

**MATTER 4 - WATERLOO
EXPENSES - OCTOBER 2001**

Wallace
King
&
Marraro
Branson

WALLACE KING MARRARO & BRANSON, PLLC
1050 THOMAS JEFFERSON STREET, N.W.
WASHINGTON, DC 20007
Phone 202.204.1000
Fax 202.204.1001

December 13, 2001

W. R. Grace & Co.
Attention: Akos L. Nagy
7500 Grace Drive
Columbia, MD 21044

Invoice #12499

For Professional Services Rendered In Connection with Waterloo - Brewer Road Site - Matter 4

Disbursements:

	<u>Amount</u>
Copy Costs - Internal	1.20
Facsimile Costs	24.75
FedEx Costs	21.96
Total Disbursements	<u>\$47.91</u>

**MATTER 5 - MOTORWHEEL
EXPENSES - OCTOBER 2001**

Wallace
King
&
Marraro
Branson

WALLACE KING MARRARO & BRANSON, PLLC
1050 THOMAS JEFFERSON STREET, N.W.
WASHINGTON, DC 20007

Phone 202.204.1000
Fax 202.204.1001

December 13, 2001

W. R. Grace & Co.
Attention: Lydia Duff, Esq.
7500 Grace Drive
Columbia, MD 21044

Invoice #12500

For Professional Services Rendered in Connection with the Motor Wheel Site - Matter 5

Disbursements:

	<u>Amount</u>
Copy Costs - Internal	10.80
Total Disbursements	<u>\$10.80</u>